

JORDAN ETH (BAR NO. 121617)  
[JEth@mofo.com](mailto:JEth@mofo.com)  
JUDSON E. LOBDELL (BAR NO. 146041)  
[JLobdell@mofo.com](mailto:JLobdell@mofo.com)  
MARK R.S. FOSTER (BAR NO. 223682)  
[MFoster@mofo.com](mailto:MFoster@mofo.com)  
MORRISON & FOERSTER LLP  
425 Market Street  
San Francisco, California 94105  
Telephone: 415.268.7000  
Facsimile: 415.268.7522

ANNA ERICKSON WHITE (BAR NO. 161385)  
[AWWhite@mofo.com](mailto:AWWhite@mofo.com)  
MORRISON & FOERSTER LLP  
755 Page Mill Road  
Palo Alto, California 94304  
Telephone: 650.813.5600  
Facsimile: 650.494.0792

Attorneys for Defendants YAHOO! INC., TERRY S. SEMEL,  
AND SUSAN L. DECKER

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MANFRED HACKER, on Behalf of Himself and  
All Others Similarly Situated,

Plaintiffs,

v.

YAHOO! INC., TERRY S. SEMEL, AND  
SUSAN L. DECKER,

Defendants.

**CLASS ACTION**

Case No. C-07-2592-MJJ

**STIPULATION AND  
[PROPOSED] ORDER  
DEFERRING RESPONSE DATES**

1 Pursuant to Civil Local Rules 6-1 and 7-12, as well as paragraph 7 of this Court's  
2 Standing Order, the parties hereby stipulate, subject to the Court's approval, as follows:

3 WHEREAS, this securities class action lawsuit was instituted in this district on May 16,  
4 2007, on behalf of all persons who purchased or otherwise acquired the publicly traded securities  
5 of Yahoo! Inc. ("Yahoo!") between April 8, 2004, and July 18, 2006;

6 WHEREAS, a lead plaintiff has not yet been appointed pursuant to 15 U.S.C.  
7 §78u-4(a)(3)(B) of the Securities Exchange Act of 1934;

8 WHEREAS, counsel for the parties have met and conferred and agreed that the due date  
9 for defendants' responses to the complaint should be deferred until a lead plaintiff is appointed;

10 WHEREAS, the agreed-upon extension is not for the purpose of delay, promotes judicial  
11 efficiency, and will not cause prejudice to either party;

12 NOW, THEREFORE,

13 Without prejudice to any parties' right to seek interim relief, defendants' response date  
14 shall be deferred until twenty (20) days following the appointment of a lead plaintiff and lead  
15 counsel, by which time counsel for lead plaintiff and counsel for defendants shall confer to  
16 (a) confirm whether the lead plaintiff will file a new complaint that supersedes all previously filed  
17 complaints or deem the existing complaint operative; and (b) establish a common response date  
18 for all defendants, including a briefing schedule on defendants' anticipated motions to dismiss.

1 Dated: June 11, 2007

MORRISON & FOERSTER LLP

2  
3 By: Judson E. Lobdel [e-filing signature]

4 JORDAN ETH  
5 JUDSON E. LOBDELL  
6 MARK R.S. FOSTER  
7 MORRISON & FOERSTER LLP  
8 425 Market Street  
9 San Francisco, California 94105-2482  
10 Telephone: 415.268.7000  
11 Facsimile: 415.268.7522

12 ANNA ERICKSON WHITE  
13 MORRISON & FOERSTER LLP  
14 755 Page Mill Road  
15 Palo Alto, California 94304  
16 Telephone: 650.813.5600  
17 Facsimile: 650.494.0792

18 Attorneys for Defendants Yahoo! Inc., Terry S.  
19 Semel, and Susan L. Decker

20 Dated: June 11, 2007

SCOTT + SCOTT LLP

21 By: Arthur Shingler, III [e-filing signature]

22 ARTHUR SHINGLER, III  
23 NICHOLAS J. LICATO  
24 SCOTT + SCOTT  
25 600 B Street, Suite 1500  
26 San Diego, California 92101  
27 Telephone: 619.233.4565  
28 Facsimile: 619.233.0508

Attorneys for Plaintiff

**[PROPOSED] ORDER**

On the stipulation of the parties, and good cause appearing:

IT IS SO ORDERED.

Date: \_\_\_\_\_, 2007

\_\_\_\_\_  
Honorable Martin J. Jenkins  
United States District Court Judge

\* \* \* \* \*

**ECF ATTESTATION**

I, Mark Foster, am the ECF User whose ID and Password are being used to file this:

**STIPULATION AND [PROPOSED] ORDER DEFERRING RESPONSE DATES**

In compliance with General Order 45, X.B., I hereby attest that Judson E. Lobdell and Arthur Shingler, III have concurred in this filing.

DATED: June 11, 2007

MORRISON & FOERSTER LLP

By: /s/ Mark Foster [e-filing signature]